



Bill

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September 2, 1980

Director, Nuclear Reactor Regulation  
Att Mr Dennis M Crutchfield, Chief  
Operating Reactor Branch No 5  
US Nuclear Regulatory Commission  
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 -  
BIG ROCK POINT PLANT - PROPOSED  
PROBABILISTIC RISK ASSESSMENT:  
ADDITIONAL INFORMATION FOR NRC REVIEW

By letter dated August 25, 1980, Consumers Power Company provided information relative to emergency diesel generator (EDG) periodic testing. A discrepancy has been noted affecting the proposed increase in EDG start time acceptance criteria. This discrepancy involves the bases on which the required EDG start time is derived. The Big Rock Point LOCA-ECCS Analyses establish required EDG start times based on MAPLHGR limits associated with the dry out time of the core.

The current Technical Specifications MAPLHGR limits assume time to rated ECCS spray flow during a DBA is 20.4 seconds. The resulting required EDG start time is 13.9 seconds. The most recent MAPLHGR analysis which provides the basis for Consumers Power Company's Technical Specifications change request dated February 25, 1980 assumed rated ECCS spray flow is provided 46.2 seconds after the DBA. This analysis also assumes that the core spray system (ECCS) provides the rated spray flow in 15 seconds after actuation (actual rated spray flow occurs approximately 6.5 seconds after actuation). Therefore, EDG start time of 31.2 seconds or less is required to provide rated spray flow.

Until February 25, 1980 Technical Specifications change request is approved, two EDG start time acceptance criteria will be used to fulfill Technical Specifications reporting criteria and EDG testing criteria. Technical Specifications reporting will be based on a 13.9 second start time to satisfy currently approved MAPLHGR limits. For the purposes of failure rate determination in accordance with Regulatory Guide 1.08, a 31.2 second start time will be used as described in our letter dated August 25, 1980.

It is requested that the Commission continue its review and provide approval of our February 25, 1980 Technical Specifications change request. Plant power levels are currently administratively limited by the low reactor level (LRL) trip set point as described in our Technical Specifications change request dated August 25, 1980. Upon approval of this request, current MAPLHGR limits will restrict power

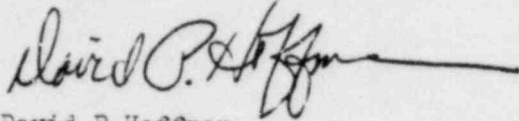
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Proposed Probabilistic  
Risk Assessment -  
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operation to 220 MW<sub>g</sub> (approximately 67 MW<sub>e</sub> gross) which correlates to an approximate 2 MW<sub>e</sub> net derate below the next most restrictive fuel thermal-hydraulic limit. Therefore, approval of the February 25, 1980 Technical Specifications change request will allow the 31.2 second EDG start time to be used for both reporting and failure rate determination, and will provide an increase in power output assuming approval of the August 25, 1980 Technical Specifications change request.



David P Hoffman  
Nuclear Licensing Administrator

CC JGKepler, USNRC  
NRC Resident Inspector - Big Rock Point